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July 8, 2021

By ECF

The Honorable James L. Cott
United States Magistrate Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *United States v. Seth Andrew*, 21 Mag. 4262

Dear Judge Cott:

We represent Mr. Seth Andrew in the above-captioned case. As set forth below, we write to respectfully request that the Court: (i) grant permission for Mr. Andrew to travel outside of his district of residence from July 12 to 13; and (ii) modify the bail conditions imposed by the Court on April 27, 2021 and May 19, 2021. *See* ECF Nos. 4, 6. The government and Pretrial Services Officer Tim Donohue do not oppose these requests.

Under the terms of his release, Mr. Andrew must remain within the District of Rhode Island, where he currently resides, except for attorney visits and court appearances. We respectfully request that Mr. Andrew be permitted to travel from July 12 to 13 for his daughter's birthday party at Great Wolf Lodge Water Park, which is located in Fitchburg, MA.

In addition, we respectfully request that the Court modify Mr. Andrew's conditions of release to permit him to travel to Massachusetts, Connecticut, and New York for periodic day trips, provided that he receive prior approval from his Pretrial Services Officer.

We thank the Court for its consideration of these requests.

Respectfully submitted,
KRIEGER KIM & LEWIN LLP

By: 

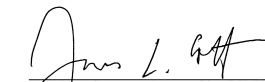
Edward Y. Kim
Varun A. Gumaste

cc: AUSA Ryan B. Finkel
Pretrial Services Officer Dominique Jackson (SDNY)
Pretrial Services Officer (DRI) Tim Donohue

Without objection from the Government or Pretrial Services, the requests are granted.

SO ORDERED.

July 8, 2021


JAMES L. COTT
United States Magistrate Judge